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26 ELECTRIC SOLIDUS, INC. d/b/a SWAN BITCOIN

27 **IN THE UNITED STATES DISTRICT COURT**

28 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

19 **WESTERN DIVISION**

20 ELECTRIC SOLIDUS, INC. d/b/a
21 SWAN BITCOIN, a Delaware
22 corporation,

23 Plaintiff,

24 v.

25 PROTON MANAGEMENT LTD., a
26 British Virgin Islands corporation;
27 THOMAS PATRICK FURLONG; ILIOS
CORP., a California corporation;
MICHAEL ALEXANDER HOLMES;
RAFAEL DIAS MONTELEONE;
SANTHIRAN NAIDOO; ENRIQUE
ROMUALDEZ; and LUCAS
VASCONCELOS,

28 Defendants.

Case No. 2:24-cv-8280

19 **PLAINTIFF'S APPLICATION FOR
20 LEAVE TO FILE DOCUMENTS
21 UNDER SEAL**

22 Judge: Hon. _____

23 Action Filed: September 25, 2024

APPLICATION TO FILE DOCUMENTS UNDER SEAL

Plaintiff Electric Solidus, Inc. (“Swan”), by and through undersigned counsel and pursuant to Central District Local Rule 79-5.2.2(a), hereby files this Application for Leave to File Documents Under Seal in Support of Plaintiff’s Complaint and of Plaintiff’s *Ex Parte* Application For Temporary Restraining Order Without Notice, Limited Protective Order, Order For Alternative Service, And OSC Re: Preliminary Injunction.

Plaintiff seeks leave to file under seal (i) Exhibit B to the Declaration of Ilissa Samplin in Support of Plaintiff's *Ex Parte* Application For Temporary Restraining Order Without Notice, Limited Protective Order, Order For Alternative Service, And OSC Re: Preliminary Injunction (the "Samplin Declaration in Support of TRO"); (ii) Exhibit C to Samplin Declaration in Support of TRO; (iii) an unredacted version of portions of Plaintiff's Complaint that references or quotes content from other commercially sensitive documents; (iv) an unredacted version of portions of Exhibit J to the Declaration Of Yan Pritzker In Support Of Plaintiff's *Ex Parte* Application For Temporary Restraining Order Without Notice, Limited Protective Order, Order For Alternative Service, And OSC Re: Preliminary Injunction (the "Pritzker Declaration in Support of TRO"); (v) an unredacted version of portions of the Declaration Of Cory Klippsten In Support Of Plaintiff's *Ex Parte* Application For Temporary Restraining Order Without Notice, Limited Protective Order, Order For Alternative Service, And OSC Re: Preliminary Injunction (the "Klippsten Declaration in Support of TRO"); and (vi) an unredacted version of portions of Plaintiff's *Ex Parte* Application For Temporary Restraining Order Without Notice, Limited Protective Order, Order For Alternative Service, And OSC Re: Preliminary Injunction ("Plaintiff's TRO Brief") that quotes or contains commercially sensitive content from Exhibits B and C to the Samplin Declaration in Support of TRO, the Klippsten Declaration in Support of TRO, and Exhibit J to the Pritzker Declaration in Support of TRO.

1 This Application is accompanied by the Declaration of Ilissa Samplin in Support
2 of Plaintiff's Application for Leave to File Documents Under Seal ("Samplin
3 Declaration"), a proposed order, and unredacted versions of the foregoing documents
4 Plaintiff seeks leave to file under seal.

5 Plaintiff thus respectfully requests an order granting it leave to file under seal (i)
6 Exhibit B to the Samplin Declaration in Support of TRO; (ii) Exhibit C to Samplin
7 Declaration in Support of TRO; (iii) those portions of Plaintiff's Complaint discussing
8 commercially sensitive confidential business information; (iv) those portions of Exhibit
9 J to the Pritzker Declaration in Support of TRO discussing commercially sensitive
10 confidential business information; (v) those portions of the Klippsten Declaration in
11 Support of TRO discussing commercially sensitive confidential business information;
12 and (vi) those portions of Plaintiff's TRO Brief discussing commercially sensitive
13 confidential business information. For the reasons set forth in the Samplin Declaration,
14 there is good cause and compelling reasons to file these documents under seal.

15
16 Dated: September 26, 2024

GIBSON, DUNN & CRUTCHER LLP

17
18 By: /s/ Ilissa Samplin

19
20 Ilissa Samplin

21
22 *Attorneys for Plaintiff*